

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Petition for Rulemaking to Further Reform the)	
Lifeline Program of Lifeline Reform 2.0 Coalition)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to the Public Notice released on July 15, 2013 (DA 13-1576), respectfully submits its comments on the petition for rulemaking filed by the Lifeline Reform 2.0 Coalition (“the Coalition”)¹ in the above-captioned proceeding. The Coalition has requested that the Commission initiate a rulemaking proceeding to consider additional reforms to further reduce waste, fraud and abuse in the Lifeline program. As discussed briefly below, Sprint supports the request for a rulemaking, as well as certain of the Coalition’s proposed reforms. However, it believes that the Coalition’s proposed in-person photo identification requirement and the additional service provider employee obligations are unworkable or unreasonably cumbersome, and should not be adopted.

The broad reforms adopted by the Commission last year² have had a major impact on the Lifeline program and have done much to improve the efficiency and efficacy of the program, generating hundreds of millions of dollars to date in reduced Lifeline

¹ The Coalition is comprised of Boomerang Wireless LLC, Blue Jay Wireless LLC, Global Connection Inc. of America, i-wireless LLC and Telrite Corp.

² *Lifeline and Link Up Reform and Modernization*, 27 FCC Rcd 6656 (2012).

spending.³ Other pending measures – most notably, the duplicates database and the eligibility database – that are scheduled to become operational in the future will be powerful tools to further improve the program. Indeed, the most efficacious action the Commission and the industry can take to improve the Lifeline program is to develop and implement a rational and coordinated plan to make these databases operational as quickly as is feasible.

Implementation of the mandated databases is not, of course, the only reform option, and Sprint supports the Coalition’s request that the Commission commence a rulemaking to consider additional reforms.⁴ Although the Coalition’s specific proposals would presumably be considered in the requested rulemaking, Sprint offers the following comments on several of those proposals.

In-person review of government-issued photo ID at the time of enrollment – Sprint agrees that requiring some form of information corroborating the identity of a Lifeline applicant could be helpful in reducing fraud, and that a government-issued photo ID would be one type of acceptable documentation. However, any personal identification requirement should not be limited to a government-issued photo ID, and in-person presentation of such documentation should not be required. Many end users who apply for Lifeline assistance may not have a government-issued photo ID such as a driver’s license or a passport, yet are eligible to participate in the Lifeline program. Other forms

³ See, e.g., *Wireline Competition Bureau Issues Final Report on Lifeline Program Savings Target*, Public Notice released January 31, 2013 (DA 13-130) (2012 savings of over \$213 million); *Wireline Competition Bureau Announces Results of the 2012 Annual Lifeline Recertification Process*, Public Notice released April 25, 2013 (DA 13-872) (2013 savings from the recertification requirement projected to be \$400 million).

⁴ Any new rulemaking proceeding should not extend to reform measures previously considered and rejected. That would be a waste of resources and an untimely petition for reconsideration.

of personal identification – work or school ID badges, voter registration cards, ID card from another social service program, a pay stub, etc. – may be more readily available and can establish identity sufficient to deter fraud in the Lifeline program.

Furthermore, the photo ID proposal would impose a stricter standard for Lifeline program participation than applies for other benefit programs that offer a higher dollar subsidy – for example, a photo ID is not required to apply for food stamp benefits (multiple other proof of identity can be provided instead).⁵ Insofar as Sprint is aware, there is no record evidence about the extent to which identity theft is a problem (*e.g.*, Mary Smith presents Jane Doe’s eligibility documentation in order to secure Lifeline service for Mary Smith). Parties advocating mandatory presentation of a government-issued photo ID should provide such evidence to justify this strict standard.

In-person presentation should not be adopted, as such proposal assumes, incorrectly, that application for Lifeline service always occurs in a face-to-face transaction. This is not always the case: some Lifeline service providers, including Assurance Wireless, accept Lifeline service applications electronically and via the mail, making in-person review of any form of ID difficult and in some cases impossible.

Retention of copies of ID and proof of eligibility documentation. Sprint agrees that Lifeline service providers should retain proof of eligibility documentation⁶ and, if evidence supports a need to obtain proof of identity, should retain that information as well.

⁵ See, *e.g.*, <http://www.masslegalhelp.org/income-benefits/fshomelessness> (citing USDA guidelines for SNAP program participation).

⁶ See Sprint’s comments in WC Docket No. 11-42 filed July 24, 2012 in response to a “Supplement to Petition for Reconsideration and Emergency Petition to Require Retention of Program-Based Eligibility Documentation” filed by TracFone Wireless.

Employee review and approval of enrollment prior to service activation. The Commission should decline to adopt this proposal. While Sprint certainly agrees that eligibility must be established prior to Lifeline service activation, there is no reason why this function should be performed only by employees of the service provider, but not by the service provider's agent. Insofar as Sprint is aware, there is no record evidence that employee review and approval is more effective than review and approval by a qualified third party agent, and use of an agent may be a cost-efficient alternative to a service provider that does not have the administrative platform or other resources to perform eligibility determinations in-house. The Commission should continue to allow eligibility determinations to be done by a third party agent, and should encourage service providers to implement effective safeguards to help ensure the accuracy of an agent's work. For example, the service provider can develop a robust training program for its agents, perform periodic audits of the agents' work, and offer a compensation package that takes accuracy into consideration. Given the range of possible safeguards, the Commission should not mandate implementation of specific measures.

Prohibition on resale of Lifeline handsets. The Coalition has proposed that the Commission "expressly ban the resale or transfer of handsets used for Lifeline service during the time the handset is associated with an active Lifeline account." Sprint does not object to such a ban; however, it is unclear how such a ban would be enforced. Sprint would be amenable to including information on a ban on reselling live Lifeline handsets in its marketing and training material, but cautions that Lifeline service providers have no way of determining whether a prohibited sale has in fact occurred.⁷ Moreover, Lifeline

⁷ For example, the service provider cannot determine whether a handset that has been reported lost or stolen, has in fact been sold by the Lifeline customer.

service providers should not be held responsible for any violation of a resale ban committed by the end user customer, as such violation would be outside the control of the service provider.

Respectfully submitted,

SPRINT CORPORATION

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